



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SME
F. #2019R01145

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 5, 2020

By ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Bo Mao
Criminal Docket No. 19-00392 (PKC)

Dear Judge Chen:

The parties write to confirm their availability for jury selection and trial in the above-referenced matter on July 6, 2021. The parties have conferred and jointly request the following pre-trial schedule:

- Pre-trial motions due: January 11, 2021
- Pre-trial motions responses due: February 8, 2021
- Pre-trial motions replies (if any) due: March 8, 2021
- CIPA 4 due: January 11, 2021
- Government expert disclosure due: March 15, 2021
- Defense expert disclosure due: April 12, 2021
- Government 3500/exhibits due: May 18, 2021
- Motions in limine due: June 2, 2021
- Responses to motions in limine due: June 23, 2021
- Defense witness list/exhibits due: June 14, 2021
- Government motions in limine regarding defense witnesses/exhibits due: June 21, 2021
- Defense response to any motions in limine regarding defense witnesses/exhibits due: June 28, 2021

- Oral argument on all motions in limine: June 30, 2021 (or on another day determined by the Court).

Respectfully submitted,
SETH D. DUCHARME
Acting United States Attorney

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Cc: Defense counsel (by ECF)